



**VOSH PROGRAM DIRECTIVE:** 02-065B

**ISSUED:** October 1, 1993

**SUBJECT:** VIRGINIA CONSTRUCTION AND TELECOMMUNICATIONS INDUSTRIES  
CONFINED SPACE STANDARD PROCEDURES AND INTERPRETATIONS  
MANUAL, CNSP.146 AND 1910.268(t)

**A. Purpose.**

This Directive revises and re-transmits to field personnel the consolidated procedures for the uniform enforcement of the Virginia Construction and Telecommunications Industries Confined Space Standards, CNSP.146 and 1910.268(t), respectively. This Directive removes references to the Virginia General Industry Confined Space Standard which is now the federal-identical Permit-Required Confined Spaces Standard, 1910.146 (**see VOSH Program Directives 02-062 and 12-121**).

This Program Directive is an internal guideline, not a statutory or regulatory rule, and is intended to provide instructions to VOSH Personnel regarding internal operation of the Virginia Occupational Safety and Health Program and is solely for the benefit of the program. This document is not subject to the Virginia Register Act or the Administrative Process Act; it does not have general application and is not being enforced as having the force of law.

**B. Scope.**

This Directive applies to all VOSH personnel and specifically to Occupational Health and Safety Enforcement and Consultation Services personnel.

**C. References.**

OSHA Instruction CPL 2-2.38C: Hazard Communication (Oct. 22, 1990).  
Field Operations Manual (FOM), Chapter VII, §4.a.(3) (March 1, 1991)

**D. Cancellation.**

VOSH Program Directive 02-065A (September 1, 1991)

**E. Action.**

The Assistant Commissioner for Enforcement, Directors and Supervisors shall assure that employers comply with the requirements of the Virginia Construction and Telecommunications Industries Confined Space Procedures and Interpretations Manual, CNSP.146 and 1910.268(t), respectively.

**F. Effective Date.**

September 1, 1993

**G. Expiration Date.**

Not Applicable.

**H. Background.**

On March 23, 1987, the Safety and Health Codes Board adopted the unique Virginia standard which regulated entry into confined spaces in general industry and construction industry, as well as in the telecommunications industry. During the same meeting, the Board decided to split the proposed standard into two separate standards - one for General Industry and the Construction Industry and the other for the Telecommunications Industry. The decision to divide the Confined Space Standard resulted from written and oral comments received during the sixty-day comment period and public hearings held.

On June 29, 1987, amendments to the standards for the construction and telecommunications industries were adopted.

On June 21, 1993, the Safety and Health Codes Board adopted the federal-identical Permit-Required Confined Spaces Standard, 1910.146 (58 Fed. Reg. 4462, January 14, 1993), which addresses confined space hazards in general industry only.

**As a result, the Virginia Confined Space Standard for General and Construction Industry was renamed the "Virginia Confined Space Standard for the Construction Industry, CNSP.146," and remains in effect for the construction and telecommunications industries.**

**I. Summary.**

The Virginia Construction and Telecommunications Industries Confined Space Standard defines a "confined space" as "any space not intended for continuous employee occupancy, having limited means of egress, and which is also subject to the accumulation of an actual or potentially hazardous atmosphere...or a potential for engulfment."

With some limited exceptions, the final standard provides the following general practices and procedures for entry into and work inside a confined space:

- (1) the employer must implement a written entry permit system;
- (2) the employer must train each employee on the hazards of working in a confined space before the employee is authorized to enter a confined space (the employer must maintain the records of the most recent training program conducted);
- (3) atmospheric testing must be conducted for oxygen level, flammability and toxic materials expected to be present;
- (4) all confined spaces must be flushed or emptied of all dangerous substances to the extent feasible and, in the case of a hazardous atmosphere, adequate ventilation must be provided; where telecommunications activities are conducted, all confined spaces must be mechanically ventilated in accordance with Bell System Practices for Testing and ventilating Manholes;
- (5) electrical and mechanical hazards must be removed or prevented from causing a hazardous situation;
- (6) when necessary, an attendant shall be stationed immediately outside every confined space (a non-attendant entry is permitted in many cases);
- (7) the employee entering a confined space with a hazardous atmosphere must be provided with an appropriate retrieval device with a retrieval line and an appropriate respirator; and
- (8) confined space entry work that occurs on a public thoroughfare must be done in accordance with requirements in the Manual on Uniform Traffic Control Devices for Streets and Highways.

**J. Standard with Citation and Compliance Guidelines.(avail. Hard copy only)**

Attached is a combined Confined Space Standard for the construction and telecommunications industries with guidelines for citing violations of individual paragraphs of the standards as well as providing guidelines to assist employers and employees in their efforts to comply with this standard. This combined standard provides a side-by-side format which permits the user in the same document to read the standard and know how the paragraphs have been interpreted.

**Provisions of the Confined Space Standard for the Telecommunications Industry which differ from those of the Construction Industry Standard will appear in italics.**

Carol Amato  
Commissioner

non e-Attachment: Virginia Construction and Telecommunications  
Industries Confined Space Standard Procedures and

Interpretations Manual, CNSP.146 and 1910.268(t)  
**(Available as hard copy only)**

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